NORRED LAW PLLC

December 8, 2022

Block Inc. (formerly Square Inc.)
Attn: Block Civil Process Team

Via: square@help-messaging.squareup.com
Via fax: 877-805-2214

Last Chance Funding, Inc.
3000 Marcus Avenue
Suite 2W15
Lake Success, NY 11042

Via email: Info@thelcfgroup.com
Via fax: 888-974-8397

RE: Notice of Bankruptcy Filing for Empire Countertops, LLC
Demand for Immediate Release of Funds in Block/Square Account
Internal Case# 7655 6541

To whom it may concern:

I represent Empire Countertops, LLC ("Empire"), which is a customer with one or more accounts at your bank. I am writing you to demand immediate release of the funds in the above-referenced account. Those funds are immediately needed to pay the court-approved wages of Empire's employees. Failure to release those funds will cause irreparable harm which could subject the bank to significant liability.
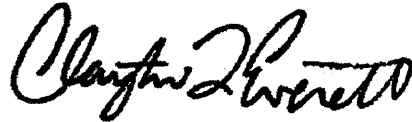
On December 5, 2022, Empire filed for protections under chapter 11 of the United States Bankruptcy Code in Case No. 22-41686-btr in the Bankruptcy Court for the Eastern District of Texas. A copy of the petition for relief is attached. The filing of the bankruptcy petition operates as a stay against collection and enforcement actions against Empire or its property under 11 U.S.C. § 362(a). In addition, the bank is required to deliver to Empire the substantial proceeds held in Empire's bank account under 11 U.S.C. § 542(a). Failure to release these funds may subject the bank to an adversary proceeding under Bankruptcy Rule 7001 for contempt of the petition for relief and recovery of the funds, plus any damages caused thereof.

Unless you immediately release the funds held in the Empire bank account, provide written confirmation of such release to my office by 4:00 pm today,

December 8, 2022, we will promptly institute legal proceedings against the bank, seeking damages in excess of the current balance being held.

If you have any questions or concerns, please call or email me.

Sincerely,

Clayton L. Everett,
Attorney at Law
clayton@norredlaw.com

CC: Mitch Mahoney via email